

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR DRAFT PERMIT NO. F-03-026

ARMAG CORPORATION
BARDSTOWN, KENTUCKY
SEPTEMBER 5, 2003
ELAHE HOUSHMAND
PLANT I.D. #21-179-00059
APPLICATION LOG #55950

SOURCE DESCRIPTION:

Armag Corporation plans to fabricate magazines designed for the storage of explosives. Over 200 varieties of products, ranging from 50 pounds to 40 tons per unit will be produced. The process will include cutting wood products for magazine interior coverings, fabricating the magazines from steel stock, preparing the magazines for painting and spraying the magazines with a protective paint coating. The magazines will be painted in two paint rooms, each equipped with a spray paint applicator. Particulate emissions are controlled with filters. The doors of the spray rooms and sand blasting room will be closed during the operations. After painting, the products will remain in the paint rooms to dry.

The source has submitted an application for construction/operation of two spray painting booths and a sand blasting operation. To preclude the applicability of Miscellaneous Metal Parts Coating (401 KAR 59:225), the facility has requested that enforceable limit be placed on their actual VOC (less than 90 tpy) emissions. The company shall be considered a conditional major source for VOC.

EMISSION FACTORS

Material Safety Data Sheet, AP-42

APPLICABLE REGULATION

401 KAR 63:060. List of hazardous air pollutants, petitions process, lesser quantity designations, and source category list.

401 KAR 59:010. New Process Operations.

EMISSION AND OPERATING CAPS DESCRIPTION:

KAR 59:010 Limitation,

Visible emissions shall not equal or exceed 20% opacity for each paint booth and total particulate emissions shall not exceed 2.34 lb/hr.

The permittee shall conduct an initial performance test for paint room #2, using Method 5, Appendix A, 40 CFR 60 averaged over three hours to show that hourly particulate emissions shall not exceed the 2.34 lb/hr limit.

Conditional Major Emission Limitations,

VOC emissions shall not exceed ninety (90) tons during any consecutive twelve (12) month period. The emissions of any individual Hazardous Air Pollutant (HAP) shall not exceed nine (9) tons during any consecutive twelve (12) month period. The emissions of combined HAPs shall not exceed twenty-two and one-half (22.5) tons per year.

Operating Limitation,

Using no more than 11,000 gallons of LM-29 in a twelve-month period will result in a maximum annual concentration of 0.009 ug/m^3 1,6-hexamethylene diisocyanate (1,6-HD), which is below the PRG of 0.01 ug/m^3 . Therefore, the source-wide usage of LM-29 coating shall not exceed 11,000 gallons for any twelve (12) consecutive months.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.